

## **Remarks**

### **Claims Status**

Claims 1-52 are currently pending. Of these claims, claims 1-9 and 11-49 are original, and claims 10 and 50-52 are previously presented.

A preliminary amendment was filed on 9/1/2004 to correct perceived issues with the claims. These issues were based on what is now known to be an incomplete version of the present patent application that was filed on 9/27/2001. For example, it was assumed, based on this incomplete patent application, that only 41 claims had been filed when in fact 49 claims had been filed. As such, the preliminary amendment included the 41 claims as well as 3 new claims 42, 43, and 44. This was obviously an incorrect action based on the true filing. Further, certain claims were thought to have been missing many or most elements, such as claims 16 and 22, or were thought to be referring to incorrect claims, based on the incomplete patent application. Again, this was obviously an incorrect assessment based on the true filing.

Based on this information, the claims in the present amendment and response are the full and current listing of the claims.

### **Office Action Remarks**

Claims 1-44 were rejected under 35 U.S.C. 102 (e) as being anticipated over Reiman et al. (5,966,431).

Currently pending independent claims 1, 16, and 31 generally claim processing a database query between one or more clients and one or more databases, comprising:

*receiving the database query from one of the clients, the database query formatted using a first protocol;*

Reiman, on the other hand, does not address such a limitation in col. 7, lines 45-49, which states “receives query data for validation and response....” These lines do not specify formatting a database query. Further, Reiman in Col 21, lines 24-29 states, “FIG 7 shows in greater detail the translating and converting of a message with a first protocol to a message with a second protocol” which is clearly not stated in this element of the claim.

The claims further comprise:

*selecting one of the databases to process the database query;*

Reiman, on the other hand, does not address such a limitation in Col. 7 lines 50-55 which states “the query has to be translated, reformatted, and sent over the local area network (LAN) to the file server...” The present element is specific to selecting a particular database, not translating, reformatting or using a LAN or file server.

The claims further comprise:

*translating the database query from the first protocol to a second protocol; and sending the translated database query to the selected database for processing;*

Reiman, on the other hand, does not address such limitations in Col. 7 lines 50-55 which describe a LAN, a file server, and the step of reformatting.

The claims further comprise:

*receiving a response to the database query from the selected database, the response formatted using the second protocol; and translating the response from the second protocol to the first protocol;*

Reiman, on the other hand, does not address such limitations in Col. 7 lines 54-67 which states, “The gateway receives a response from the file server. This response is then reformatted and sent back to STP 11, Gateway 18 has to break down the layers of the SS7 protocol, for example ....When file server 22 has performed its validation, a response packet is sent therefrom to gateway 18. Gateway 18 would have to reconvert the response packet from the file server to a TCAP response.”

The present elements describe a database, not a file server. Further, the present elements do not reformat which is simply a rearrangement of existing data.

The claim further comprises:

*determining which of the clients sent the database query;*

Reiman, on the other hand, does not address such limitations in Col. 7, lines 54-67 which discuss reformatting, file servers and response packets. There is no explanation or analysis of determining which client actually sent a database query.

The claim further comprises:

*sending the translated response to the client that sent the database query.*

Reiman, on the other hand, in Col. 7, lines 54-67 discusses calling party addresses but does not discuss how to find and send a translated response to the original client.

Reiman in Col. 8, lines 1-3 states, “This TCAP response is then forwarded to STP11 with the called number in the layer that also contains the calling party addresses in the original query.”

The “called number” and “calling party addresses” in the SS7 message have nothing to do with a response route to the sender. That information will not enable a response to be sent to the client that sent the database query, as is performed in the currently pending element. It is well known, accepted and further documented (from Telcordia, for example) that a “called number” or “calling party address” has no bearing on who to respond to, or how to route a response.

#### Previously Presented Claims

Claims 50-52 were previously and incorrectly presented as new claims 42-44 in the preliminary amendment filed 9/1/2004. Other than the claim numbers, these claims remain unchanged.

Currently pending claim 50 describes a method of processing a database query between at least one client and at least one database, comprising: receiving the database query from the client, the database query formatted using a first protocol; selecting the database to process the database query; translating the database query from the first protocol to a second protocol; sending the translated database query to the selected database for processing; receiving a response to the database query from the selected database, the response formatted using the second protocol; translating the response from the second protocol to the first protocol; and sending the translated response to the client.

Currently pending claim 52 describes a method of processing a database query, comprising: receiving the database query based on a first protocol; translating the database query from the first protocol to a second protocol; receiving a response formatted using the second protocol; and translating the response from the second protocol to the first protocol.

### Conclusions

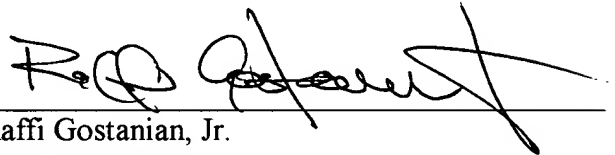
Per the comments above, Applicants do not believe that Reiman describes or suggests each of the elements in independent claims 1, 16, 31, 50, and 52. As such, Applicants believe independent claims 1, 16, 31, 50, and 52 are in condition for allowance and respectfully request they be passed to allowance.

Since claims 2-15 depend on claim 1, since claims 17-30 depend on claim 16, since claims 32-49 depend on claim 31, and since claim 51 depends on claim 50, Applicants believe these dependent claims are in condition for allowance and respectfully request they be passed to allowance.

A check for \$225 is included herein to cover a 2 month extension of time.

If the Examiner has any other matters which pertain to this Application, the Examiner is encouraged to contact the undersigned to resolve these matters by Examiner's Amendment where possible.

Respectfully Submitted,



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